STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT CASE NO. NO. 2:23-CV-01719

27

28

Pursuant to LR IA 6-1, Plaintiff Charles Bezak and Defendant MGM Resorts International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to respond to the Complaint be extended from the current deadline of December 12, 2023 to and including January 11, 2024. This is the second stipulation for an extension of time to file MGM's responsive pleading. The court previously granted an extension on November 27, 2023. ECF No. 11.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently ten other related actions filed against MGM pending in the District of Nevada (the "Related Actions"). See Owens v. MGM Resorts Int'l, No. 2:23-cv-01480 (D. Nev.); Kirwan v. MGM Resorts Int'l, No. 2:23-cv-01481 (D. Nev.); Zussman v. VICI Properties 1 LLC, et al., No. 2:23-cv-01537 (D. Nev.); Lackey v. MGM Resorts Int'l, No. 2:23-cv-01549 (D. Nev.); Pircio v. MGM Resorts Int'l, No. 2:23-cv-01550 (D. Nev.); Terezo v. MGM Resorts Int'l, No. 2:23-cv-01577 (D. Nev.); Rundell v. MGM Resorts Int'l, No. 2:23-cv-01698 (D. Nev.); Zari v. MGM Resorts Int'l, No. 2:23-cv-01777 (D. Nev.); Manson v. MGM Resorts Int'l, No. 2:23-cv-01826 (D. Nev.); Albrigo v. MGM Resorts Int'l, No. 2:23-cv-1981 (D. Nev.). One other action is pending in the District of New Jersey. Lassoff v. MGM Resorts Int'l, No. 1:23-cv-20419.

The parties in the Related Actions are actively preparing a joint motion to consolidate the Related Actions. As such, additional time is required to permit time to meet and confer with the various parties to the Related Actions and finalize the joint motion.

The Parties' request is made in good faith to enable the parties to finalize the joint motion for consolidation and conserve judicial and party resources. Moreover, this case is in its infancy, and this request will not prejudice any party.

A proposed order is attached.

1	WHEREAS the Parties respectfully request that MGM shall have until January 11		
2	2024 to answer, move, or otherwise respond to the Complaint.		
3	Dated: December 11, 2023	Respectfully submitted,	
4		THE BOURASSA LAW GROUP	
5			
6		/s/ Mark J. Bourassa MARK J. BOURASSA	
7		JENNIFER A. FORNETTI VALERIE S. CHRISTIAN	
8		2350 W. Charleston Blvd., Suite 100 Las Vegas, Nevada 89102	
9		Telephone: (702) 851-2180 mbourassa@blgwins.com	
10		jfornetti@blgwins.com vchristian@blgwins.com	
11		S S	
12		GARY F. LYNCH (pro hac vice) PATRICK D. DONATHEN (pro hac vice)	
13		LYNCH CARPENTER LLP 1133 Penn Avenue, 5th Floor	
14		Pittsburgh, Pennsylvania 15222 Telephone: (412) 322-9243	
		gary@lcllp.com	
15		patrick@lcllp.com	
16 17		Attorneys for Plaintiff and the Proposed Class	
18		/s/ Todd L. Bice	
19		Todd L. Bice	
20		PISANELLI BICE, PLLC 400 S. 7th Street Suite 300	
		Las Vegas, NV 89101 Telephone: 702.214.2100	
21		tlb@pisanellibice.com	
22		Angela C. Agrusa*	
23		DLA PIPER LLP (US) 2000 Avenue of the Stars	
24		Suite 400 North Tower Los Angeles, CA 90067-4735	
25		Telephone: 310.595.3000 angela.agrusa@us.dlapiper.com	
26		*Pro hac vice application forthcoming	
27		Attorneys for Defendant	
28		MGM Resorts International	
-			

1 2	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
3 4 5 6 7 8	CHARLES BEZAK, individually and on behalf of all others similarly situated Plaintiff, v. MGM RESORTS INTERNATIONAL, Defendant.	Case No. 2:23-cv-1719-RFB-BNW [PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT		
9				
10	Upon consideration of the foregoing stipulation to extend Defendant MGM Resort			
11	International's time to file response to Plaintiff's Complaint in the above-captioned action			
12	it is hereby ORDERED that the Stipulation is GRANTED , and the time for MGM Resort			
13	International to answer, move, or otherwise respond to Plaintiff's Complaint is hereb			
14	extended to and including January 11, 2024.			
15				
16	IT IS SO ORDERED:			
17	Hon. Brenda Weksler United States Magistrate Judge			
18				
19				
20	DATED: _	12/12/2023		
21				
22				
23				
24				
25				
26				
27				
28				